## **RUHNKE & BARRETT**

ATTORNEYS AT LAW

## PAGE | DOC #: 2 WALL STREET, THIRD FLOOR MONTCLAIR, N. 10704 FE FE HENEW YORK, N.Y. 10005 | 973-746-1490 (FAX) | 212-571-3792 (FAX) | 3/4 |

DAVID A. RUHNKE (davidruhnke@ruhnkeandbarrett.com)

JEAN D. BARRETT (jeanbarrett@ruhnkeandbarrett.com)

## REPLY TO MONTCLAIR OFFICE

By Fax - (212)805-7942 Honorable Alvin K. Hellerstein United States District Judge United States Courthouse 500 Pearl Street, Room 1050 New York, NY 10007



the coy s'agand,
alter is Kelulal,
to April 29 2011,
1100 A.M. 4011

Re: United States v. Alejo Polanco-Padilla, 05 Cr. 185 (AKH)

Dear Judge Hellerstein:

I write, respectfully, on behalf of Alejo Polanco-Padilla to request that the status conference be adjourned until three weeks after the next status conference in the Eastern District case. As the Court may recall, we are trying to coordinate disposition of both cases. The Brooklyn case had been assigned to Judge Traeger, who recently passed away. It has been reassigned to the Honorable Sandra L. Townes, U.S.D.J. At a recent status conference, Judge Townes scheduled the matter for another status conference on April 8, 2011, a date by which the Government and counsel represented that how the case would go forward could be resolved.

I have communicated with A.U.S.A. Jessica Masella and we agree that it would be optimum to have a status conference in this case about three weeks after the Brooklyn conference which would be the week of April 22. Consequently, it is respectfully requested that the status conference in this matter be adjourned until the week of April 22. I have a sentence schedule for that Monday morning in another district but otherwise my calendar is clear.

The Government joins in this application. We agree that the requested adjournment is in Mr. Polanco's interest and the need for a speedy trial exclusion outweighs the defendant's and the public's interest in a speedy trial.

Respectfully-yours

Jean D. Barrett

cc:

Jessica A. Masella, A.U.S.A. [by email]

C:\Users\front\_desk\AppData\Local\Microsoft\Windows\Temporary\_Internet\_Files\Content\_Outlook\H7\PD5MSR\Judge\_Hcllerstein\_3-3-11.wpd